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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF MICHAEL B.
SHORTNACY REGARDING
PLAINTIFFS NOT IN COMPLIANCE
WITH THE COURT'S
SEPTEMBER 16, 2025 ORDER
[ECF 3922]**

Judge: Hon. Charles R. Breyer
Courtroom: 6-17th Floor

This Document Relates to:

Jane Doe LS 37 v. Uber Technologies, Inc., et al., No. 3:23-cv-04393-CRB

E.D. v. Uber Technologies, Inc., et al., No. 3:23-cv-05307-CRB

Jane Doe LS 244 v. Uber Technologies, Inc., et al., No. 3:23-cv-05372-CRB

H.L. v. Uber Technologies, Inc. et al., No. 3:24-cv-04526-CRB

Jane Roe CL 12 v. Uber Technologies, Inc., et al., No. 3:24-cv-04673-CRB

1 *WHB 1293 v. Uber Technologies, Inc., et al.,*
1 No. 3:24-cv-04817-CRB

2 *WHB 1027 v. Uber Technologies, Inc., et al.,*
2 No. 3:24-cv-04820-CRB

4 *WHB 928 v. Uber Technologies, Inc., et al.,* No.
4 3:24-cv-04825-CRB

6 *WHB 511 v. Uber Technologies, Inc., et al.,* No.
6 3:24-cv-04842-CRB

7 *WHB 860 v. Uber Technologies, Inc., et al.,* No.
8 3:24-cv-04845-CRB

9 *WHB 1023 v. Uber Technologies, Inc., et al.,*
10 No. 3:24-cv-04877-CRB

11 *WHB 1002 v. Uber Technologies, Inc., et al.,*
12 No. 3:24-cv-04885-CRB

13 *WHB 1497 v. Uber Technologies, Inc., et al.,*
14 No. 3:24-cv-04891-CRB

15 *WHB 310 v. Uber Technologies, Inc., et al.,* No.
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17 *WHB 333 v. Uber Technologies, Inc., et al.,* No.
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19 *WHB 56 v. Uber Technologies, Inc., et al.,* No.
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21 *WHB 312 v. Uber Technologies, Inc., et al.,* No.
22 3:24-cv-04928-CRB

23 *WHB 1590 v. Uber Technologies, Inc., et al.,*
24 No. 3:24-cv-04946-CRB

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27 *WHB 1960 v. Uber Technologies, Inc., et al.,*
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29 *WHB 1619 v. Uber Technologies, Inc., et al.,*
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2 3:24-cv-04965-CRB

3 *WHB 676 v. Uber Technologies, Inc., et al.*, No.
4 3:24-cv-05024-CRB

5 *WHB 1837 v. Uber Technologies, Inc., et al.*,
6 No. 3:24-cv-05033-CRB

7 *WHB 1902 v. Uber Technologies, Inc., et al.*,
8 No. 3:24-cv-05040-CRB

9 *WHB 1431 v. Uber Technologies, Inc., et al.*,
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11 *WHB 666 v. Uber Technologies, Inc., et al.*, No.
12 3:24-cv-05127-CRB

13 *LS 523 v. Uber Technologies, Inc., et al.*, No.
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20 *al.,* No. 3:24-cv-05591-CRB

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25 *WHB 1552 v. Uber Technologies, Inc., et al.,*
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1 No. 3:24-cv-05603-CRB

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14 *WHB 1611 v. Uber Technologies, Inc., et al.,*
15 No. 3:24-cv-05665-CRB

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19 No. 3:24-cv-05669-CRB

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23 *al.,* No. 3:24-cv-05706-CRB

24 *WHB 1142 v. Uber Technologies, Inc., et al.,*
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26 *WHB 1057 v. Uber Technologies, Inc., et al.,*
27 No. 3:24-cv-05715-CRB

28 *WHB 1470 v. Uber Technologies, Inc., et al.,* No.
29 3:24-cv-05716-CRB

30 *Jane Roe CL 44 v. Uber Technologies, Inc., et al.,*
31 No. 3:24-cv-05744-CRB

1 *WHB 494 v. Uber Technologies, Inc., et al.*, No.
2 3:24-cv-05767-CRB

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4 3:24-cv-05770-CRB

5 *WHB 935 v. Uber Technologies, Inc., et al.*, No.
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7 *LS 455 v. Uber Technologies, Inc., et al.*, No. 3:24-
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9 *CL 55 v. Uber Technologies, Inc., et al.*, No. 3:24-
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11 *LS 363 v. Uber Technologies, Inc., et al.*, No. 3:24-
12 cv-05891-CRB

13 *LS 318 v. Uber Technologies, Inc., et al.*, No. 3:24-
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21 *DMA 1 v. Uber Technologies, Inc., et al.*, No. 3:24-
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4 *B.B. v. Uber Technologies, Inc., et al.,* No. 3:24-cv-
4 07492-CRB

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9 08342-CRB

10 *Jane Doe NLG (HK) v. Uber Technologies, Inc., et*
11 *al.,* No. 3:24-cv- 08614-CRB

12 *S.G. v. Uber Technologies, Inc., et al.,* No. 3:24-cv-
13 08675-CRB

14 *Dadej v. Uber Technologies, Inc., et al.,* No. 3:24-
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15 *C.B. v. Uber Technologies, Inc., et al.,* No. 3:24-cv-
16 09049-CRB

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20 09052-CRB

21 *S.H. v. Uber Technologies, Inc., et al.,* No. 3:24-cv-
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26 *al.,* No. 3:24-cv- 09216-CRB

27 *D.C. 2636 v. Uber Technologies, Inc., et al.,* No.
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27 *Jane Doe 693827 v. Uber Technologies, Inc., et al.,*
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3 *CL 94 v. Uber Technologies, Inc., et al.,* No. 3:24-
4 cv-09550-CRB

5 *CL 96 v. Uber Technologies, Inc., et al.,* No. 3:25-
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7 *I.A. v. Uber Technologies, Inc., et al.,* No. 3:25-cv-
8 00822-CRB

9 *CL 99 v. Uber Technologies, Inc., et al.,* No. 3:25-
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11 *L.F. v. Uber Technologies, Inc., et al.,* No. 3:25-cv-
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13 *W.H.B. 2060 v. Uber Technologies, Inc., et al.,* No.
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15 *W.H.B. 2061 v. Uber Technologies, Inc., et al.,* No.
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17 *W.H.B. 2062 v. Uber Technologies, Inc., et al.,* No.
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19 *W.H.B. 2063 v. Uber Technologies, Inc., et al.,* No.
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21 *W.H.B. 2064 v. Uber Technologies, Inc., et al.,* No.
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23 *W.H.B. 2067 v. Uber Technologies, Inc., et al.,* No.
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25 *W.H.B. 2070 v. Uber Technologies, Inc., et al.,* No.
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27 *W.H.B. 2071 v. Uber Technologies, Inc., et al.,* No.
28 3:25-cv-01130-CRB

29 *W.H.B. 2073 v. Uber Technologies, Inc., et al.,* No.
30 3:25-cv-01143-CRB

31 *W.H.B. 2075 v. Uber Technologies, Inc., et al.,* No.
32 3:25-cv-01148-CRB

33 *W.H.B. 2077 v. Uber Technologies, Inc., et al.,* No.
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1 *S.W. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
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3 *C.C. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
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5 *M.S. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
6 01863-CRB

7 *Halligan v. Uber Technologies, Inc., et al.*, No. 3:25-
8 cv-02104-CRB

9 *T.C. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
10 02109-CRB

11 *Jane Doe LS 578 v. Uber Technologies, Inc., et al.*,
12 No. 3:25-cv-02405-CRB

13 *CL 129 v. Uber Technologies, Inc., et al.*, No. 3:25-
14 cv-02498-CRB

15 *A.M. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
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19 *A.J. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
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21 *Jane Doe NLG (KS) v. Uber Technologies, Inc., et*
22 *al.*, No. 3:25-cv- 02616-CRB

23 *K.B. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
24 02650-CRB

25 *N.K. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
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27 *J.M., v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
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29 *T.M. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
30 02704-CRB

31 *S.F. v. Uber Technologies, Inc., et al.,* No. 3:25-cv-
32 02708-CRB

33 *CL 132 v. Uber Technologies, Inc., et al.*, No. 3:25-
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1 *NLG (IM) v. Uber Technologies, Inc., et al.*, No.
2 3:25-cv-02771-CRB

3 *M.H. v. Uber Technologies, Inc., et al.*, No. 3:25-
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5 *K.T. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
6 02880-CRB

7 *T.P. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
8 03016-CRB

9 *CL 143 v. Uber Technologies, Inc., et al.*, No. 3:25-
10 cv-03260-CRB

11 *CL 145 v. Uber Technologies, Inc., et al.*, No. 3:25-
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13 *J.P.F. v. Uber Technologies, Inc., et al.*, No. 3:25-
14 cv-03289-CRB

15 *J.M. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
16 03364-CRB

17 *Batterson, Vanessa v. Uber Technologies, Inc., et al.*,
18 No. 3:25-cv- 03378-CRB

19 *V.M. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
20 03591-CRB

21 *CL 153 v. Uber Technologies, Inc., et al.*, No. 3:25-
22 cv-03818-CRB

23 *Crystal Lugo v. Uber Technologies, Inc., et al.*, No.
24 3:25-cv-03969-CRB

25 *Breanna Donaldson v. Uber Technologies, Inc., et
26 al.*, No. 3:25-cv- 03976-CRB

27 *C.E. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
28 04100-CRB

29 *S.S. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
30 04143-CRB

31 *W.M. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
32 04717-CRB

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34 04719-CRB

1 *R.H. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
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4 04766-CRB

5 *V.R. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
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9 *L.K. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
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DECLARATION OF MICHAEL B. SHORTNACY

I, Michael B. Shortnacy, declare pursuant to 28 U.S.C. § 1746:

1. I am over the age of 18 and am a resident of Los Angeles, CA. I respectfully submit this declaration identifying the plaintiffs that are not in compliance with the Court's September 16, 2025 Order [ECF 3922].

2. I am a partner at the law firm of Shook, Hardy & Bacon L.L.P., attorneys of record for Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC, (collectively, "Defendants"). I am a member in good standing of the Bar of the State of California, the Bar of the State of New York, and the Bar of the District of Columbia. I know the following facts to be true of my own knowledge, and if called to testify, I could competently do so.

3. On September 16, 2025, the Court ordered each Plaintiff subject to Uber's Motion to Dismiss Cases for Failure to Comply with PTO 10 to provide a substantially complete and verified Plaintiff Fact Sheet within 14 days of the Order. The Order therefore compelled compliance by each Plaintiff subject to the Order by September 30, 2025.

4. The Court also ordered counsel for Defendants to submit a declaration within 21 days of the Order (*i.e.*, by October 7, 2025), identifying which, if any, Plaintiffs did not comply with the Court’s Order.

5. Counsel for Defendants has reviewed all submissions to MDL Centrality by the Plaintiffs subject to the Court's September 16, 2025 Order to determine whether each Plaintiff has submitted a substantially complete and verified Plaintiff Fact Sheet as ordered by the Court. [ECF 3922.]

6. Based on counsel for Defendants' review of all submissions to MDL Centrality by the Plaintiffs subject to the Court's September 16, 2025 Order, as of October 6, 2025, the Plaintiffs identified in the table attached to this declaration as **Exhibit A** have failed to submit a substantially complete and verified Plaintiff Fact Sheet as ordered by the Court.

I declare under penalty of perjury that the foregoing is true and correct.

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1 Executed on October 6, 2025, in Los Angeles, California.

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3 /s/Michael B. Shortnacy

4 Michael B. Shortnacy

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